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April 6, 2023

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 4/6/2023**Via ECF Only**Hon. Nelson S. Román  
United States District Judge, Southern District  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601**Re: Clear Channel Outdoor, LLC v. City of New Rochelle, et al.**  
**Index No. 7:20-cv-09296-NSR-AEK**  
**Vector Media, LLC v. City of New Rochelle, et al.**  
**Index No. 7:21-cv-00266-NSR-AEK**

Dear Justice Román:

In connection with Defendants' Opposition to Clear Channel's Motion for Summary Judgment and Cross-Motion for Summary Judgment, Defendants have referenced and quoted in their Counter Statement of Undisputed Material Facts and their Reply Memorandum of Law certain documents from Plaintiff's production upon which Plaintiff has placed various levels of confidentiality designations. Accordingly, we respectfully request leave to file the following papers and exhibits whereby the specific references to and quotations from documents so designated by Plaintiff are redacted:

Document	Public ECF	Sealed ECF	Basis to Seal
CSUMF	219	222	The CSUMF contains certain sections discussing information Clear Channel claims is confidential, including its lease terms and internal emails.
Exhibit B	220-2	223-1	Clear Channel claims this internal email is confidential.
Exhibit C	220-3	223-2	Same
Exhibit D	220-4	223-3	Same
Exhibit E	220-5	223-4	Same
Exhibit F	220-6	223-5	Same
Exhibit H	220-8	223-6	Clear Channel claims this lease is confidential.
Reply Memo. of Law	233	235	The memo contains a short section discussing Clear Channel leases that Clear Channel claims are confidential.
Exhibit A	234-1	236-1	Clear Channel claims these leases are confidential.

MEMO ENDORSED

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The basis for this sealing request is set forth in more detail in Clear Channel's letter at ECF Dkt. 239. In accordance with the rules of the Court, we have contemporaneously filed a publicly available version of the papers in redacted form, and a separate entry of the papers filed under seal with the proposed redactions designated with red text. Defendants respectfully reserve their rights to challenge such confidentiality designations at trial.

Respectfully,

HARRIS BEACH PLLC



Darius P. Chafizadeh

DPC:sjm


Defendants' motion to seal the documents indicated herein is GRANTED.

The Court respectfully directs the Clerk of Court to place ECF Nos. 222, 223-1, 223-2, 223-3, 223-4, 223-5, 223-6, 235, 236-1 under seal, accessible only to the Court and the parties.

The Clerk of the Court is directed to terminate the motions at ECF No. 240 and 216.

Dated: April 6, 2023  
White Plains, NY

SO ORDERED:

  
HON. NELSON S. ROMÁN  
UNITED STATES DISTRICT JUDGE